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15 Attorneys for Defendants,  
16 STEWART INFORMATION SERVICES  
17 CORPORATION and STEWART TITLE  
18 GUARANTY COMPANY

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 \* \* \*

22 U.S. BANK NATIONAL ASSOCIATION AS  
23 LEGAL TITLE TRUSTEE FOR TRUMAN  
24 2016 SC6 TITLE TRUST,

25 Plaintiff,

vs.

26 STEWART INFORMATION SERVICES,  
27 CORP.; STEWART TITLE GUARANTY  
COMPANY; DOE INDIVIDUALS I through X;  
and ROE CORPORATIONS XI through XX,  
inclusive,

Defendants.

CASE NO. 2:21-cv-01875-JCM-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO FILE  
RESPONSE TO MOTION TO  
REMAND [ECF No. 9]**

**[First Request]**

28 Defendants Stewart Title Guaranty Company (“STGC”) and Stewart Information Services Corporation (“SISC”) (collectively, “Defendants”), by and through their attorneys of record, the law firm of MAURICE WOOD, and Plaintiff U.S. Bank National Association as Legal Title Trustee for Truman 2016 SC6 Title Trust (“Plaintiff”), by and through its counsel of record, WRIGHT FINLAY & ZAK, hereby stipulate and agree as follows:

29 1. On September 14, 2021, Plaintiff filed its Complaint in the Eighth Judicial District Court, Case No. A-21-841029-C. See ECF No. 1-1.

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1           2. On October 11, 2021, Defendants filed a Petition for Removal with this Court,  
2 based upon diversity jurisdiction. See ECF No. 1.

3           3. On October 12, 2021, SISC filed a Motion to Dismiss for Lack of Personal  
4 Jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2). See ECF No. 4.

5           4. The Parties previously discussed a stipulation to stay this case in its entirety, but on  
6 November 1, 2021, the Parties agreed to a partial stay pending SISC's Motion to Dismiss and  
7 Plaintiff's forthcoming Motion for Remand. Because briefing on Plaintiff's Motion to Remand  
8 will proceed, Defendants are requesting additional time to file their response to Plaintiff's Motion.

9           5. On November 1, 2021, Plaintiff filed its Motion to Remand. See ECF No. 9.

10          6. On November 3, 2021, Plaintiff filed a Stipulation and Order, requesting that  
11 Plaintiff's deadline to respond to SISC's Motion to Dismiss be extended to November 10, 2021,  
12 which SISC did not oppose. See ECF No. 11.

13          7. Defendants' deadline to respond to Plaintiff's Motion to Remand is currently  
14 November 15, 2021. See ECF No. 9.

15          8. Because SISC's Motion to Dismiss was filed first, SISC believes that SISC's  
16 Motion should be fully briefed prior to Plaintiff's Motion to Remand.

17          9. Accordingly, Defendants request a brief extension of two weeks from the current  
18 deadline, until November 29, 2021, to file its Response to Plaintiff's Motion to Remand.

19          10. Counsel for Plaintiff does not oppose the requested extension.

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1       11. This is the first request for an extension which is brought in good faith and not for  
2 purposes of delay.

3  
4 DATED this 8<sup>th</sup> day of November, 2021.

5       **MAURICE WOOD**

6 By: /s/ Elizabeth E. Aronson  
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11 *Attorneys for Defendants*

DATED this 8<sup>th</sup> day of November, 2021.

**WRIGHT FINLAY & ZAK, LLP**

By: /s/ Lindsay D. Dragon  
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14 IT IS SO ORDERED November 10, 2021.  
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17 James C. Mahan  
UNITED STATES DISTRICT COURT JUDGE  
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